

December 28, 2001

Administrator  
US Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attention: Chemical Right-to-Know Program

Registration Number: [REDACTED]

Dear Administrator Whitman:

FMC Corporation actively supports the EPA HPV Challenge Program, AR-201 and is pleased to submit the proposed test plans and robust summaries for the two single chemicals:

- Phenol, 2-[(2-methyl-2-propenyl) oxy]; Methallyloxyphenol – CAS No. 4790-71-0
- Cyclopropanecarboxylic acid, 3(2,2-dichloroethenyl)-2,2-dimethyl-, methyl ester -- CAS No. 61898-95-1

In addition to the above referenced two single chemicals, FMC's HPV Challenge commitment to EPA for 2001 included the single chemical Orthoacetic acid, trimethyl ester (TMOA) – CAS No. 1445-45-0. Please note that FMC respectfully requested the withdrawal of Orthoacetic acid, trimethyl ester (TMOA) from the program in a correspondence dated September 13, 2001 to EPA (Ms. Linda M. Clark to Chemical RTK Program). It came to FMC's attention that our sole foreign supplier of TMOA, Degussa-Huls AG, committed to test this chemical in the ICCA chemical testing initiative regarding High Production Volume chemicals as stated by Degussa-Huls AG in their letter to EPA dated January 25, 2000. EPA assigned this letter the code AR201-12311. FMC, therefore, withdrew support of TMOA given the fact it is being tested in the ICCA HPV program.

FMC proposes Closed System Intermediate Status for the two single chemicals and information supporting exemption claims for Reduced SIDS Testing has been prepared. Please note for the single chemical, Phenol, 2-[(2-methyl-2-propenyl) oxy]; Methallyloxyphenol, the test plan for aquatic toxicity indicates testing for estuarine species and not freshwater species as the potential for exposure at the manufacturing site where the chemical undergoes reaction is to estuarine species. This rationale was discussed with Mr. Richard Hefter, Chief of the HPV Chemicals Branch with verbal approval given FMC on October 3, 2001. Additionally, FMC plans to submit documentation supporting Closed System Intermediate Status for Cyclopropanecarboxylic acid, 3(2,2-dichloroethenyl)-2,2-dimethyl-, methyl ester as soon as received from the FMC customer.

This submission includes one electronic copy of documents in *Microsoft Word 97* and *IUCLID* formats. FMC understands there will be a 120-day review period for the test plan and that all comments received by EPA will be forwarded to FMC for consideration. Please contact me if you have comments or questions regarding this submission.

Sincerely,

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For FMC Corporation  
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